

City of Maple Valley

NPDES Phase II

Stormwater Management

Program Plan (SWMP)

March 2020

Table of Contents

Acro	onyms and Abbreviations	iii
1.	Introduction	1
1.1	1 Overview and Background	1
1.2	Permit Implementation Timeline in 2019 and 2020	2
2. Sto	ormwater Planning S5.C.1	3
2.1	1 Permit Requirements	3
2.2	2 2020 Planned Activities	3
3. Pu	ablic Education and Outreach S5.C.2	5
3.1	1 Permit Requirements	5
3.2	2 2019 Activities	6
3.3	3 2020 Planned Activities	9
4. Pu	ablic Involvement and Participation S5.C.3	10
4.1	1 Permit Requirements	10
4.2	2 2019 Activities	10
4.3	3 2020 Planned Activities	10
5. MS	S4 Mapping and Documentation S5.C.4	12
5.1	1 Permit Requirements	12
5.2	2 2019 Activities	13
5.3	3 2020 Planned Activities	13
6. Illi	icit Discharge Detection and Elimination S.5.C.5	14
6.1	1 Permit Requirements	14
6.2	2 2019 Activities	14
6.3	3 2020 Planned Activities	15
7. Cc	ontrolling Runoff from New Development, Redevelopment, and Construction Sites S.5	.C.6 16
7.1	1 Permit Requirements	16
7.2	2 2019 Activities	16
7.3	3 2020 Planned Activities	17
8. O ₁	perations and Maintenance S5.C.7	18
8.1	1 Permit Requirements	18
8.2	2 2019 Activities	19

8.3	2020 Planned Activities	20
9. Sourc	ce Control Program for Existing Development S5.C.8	21
9.1	Permit Requirements	21
9.2	2020 Planned Activities	21
10. Tota	al Maximum Daily Load Requirements S7	22
10.1	Permit Requirements	22
10.2	2020 Planned Activities	22
11. Mor	nitoring and Assessment S8	23
11.1	Permit Requirements	23
11.2	2019 Activities	23
11.3	2020 Planned Activities	23
12. Rep	orting S9	2
12.1	Permit Requirements	2
12.2	2019 Activities	
12.3	2020 Planned Activities	2

Acronyms and Abbreviations

AKART All Known, Available, and Reasonable Treatment

BMP Best Management Practices

CESCL Certified Erosion and Sediment Control Lead

DOE Department of Ecology

EPA Environmental Protection Agency

GIS Geographic Information System

IDDE Illicit Discharge Detection and Elimination

LID Low Impact Development

MEP Maximum Extent Practical

MS4 Municipal Separate Storm Sewer System

MVMC Maple Valley Municipal Code

NPDES National Pollutant Discharge Elimination System

OGD Our Green-Duwamish

O&M Operations and Maintenance

STORM Stormwater Outreach for Regional Municipalities

SWMP Stormwater Management Program

SWPPP Surface Water Pollution Prevention Plan

TMDL Total Maximum Daily Load

1.1 Overview and Background

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect the water quality and restore waters for "fishable, swimmable" uses. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies, which, for Washington State is the State of Washington Department of Ecology (DOE).

Municipalities with a population of more than 100,000 have been designated as Phase I communities and must comply with Ecology's Phase I NPDES Municipal Stormwater Permit as operators of large municipal separate storm sewer systems (MS4s). As a city with less than 100,000 population, the City of Maple Valley has been designated as a Phase II community and must comply with Ecology's Western Washington Phase II NPDES Municipal Stormwater Permit as an operator of a small MS4. More than 80 small and medium cities and urban portions of 5 counties in western Washington, must comply with the Phase II Permit requirements.

The Permit authorizes the discharge of stormwater runoff from municipal drainage systems into the state's surface waters (e.g. streams, lakes, wetlands) and groundwater as long as municipalities implement Permit-specific "best management practices" (BMPs). These BMPs are intended to protect water quality and reduce the discharge of non-point source pollutants to the "maximum extent practicable" (MEP). In addition, BMPs are intended to meet the state AKART (all known, available, and reasonable methods of prevention, control, and treatment) for waste discharge requirements.

The BMPs specified in the Permit are collectively referred to as the Stormwater Management Program (SWMP) and grouped under the following elements:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Operations and Maintenance
- Source Control Program for Existing Development

As a programmatic permit, the components work together to ensure protection of water quality in our streams, lakes, wetlands, and groundwater. Permit conditions are phased in over the 5-year Permit term (2019-2024). The Permit requires the City to report annually (March 31st of each year) on the progress of the program in the prior year. The Permit also requires submittal of documentation that describes proposed SWMP activities for the coming year. This document acts as the SWMP Plan that describes activities completed in 2019 and planned activities in 2020.

1.2 Permit Implementation Timeline in 2019 and 2020

On August 1, 2019 a new permit was issued for 2019-2024. The Permit requirements are phased in over the course of the 5-year Permit term. There were no new and/or increased permit terms in 2019. The new and/or increased permit terms in 2020 are:

Stormwater Planning:

August 1, 2020

• Permittee shall convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.

Public Education and Outreach:

July 1, 2020

• Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign. Permittees shall document lessons learned and recommendations. The Permittee may forgo this evaluation if they choose to develop a strategy and schedule for a new target audience and BMP behavior change campaign by February 1, 2021.

MS4 Mapping and Documentation:

January 1, 2020

• Permittee shall begin to collect size and material for all known MS4 outfalls during normal course of business and update records.

The City of Maple Valley's implementation or planned implementation of these permit requirements is addressed within this Plan.

2. Stormwater Planning S5.C.1

This section describes Permit requirements related to Stormwater Planning. The Stormwater Planning program element of the Permit is intended to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. This is a new element added to the 2019-2024 Permit, and no activities took place between August 1, 2019 and the end of the year, therefore this section will address only the Permit requirements and the planned activities in 2020 related to Stormwater Planning.

2.1 Permit Requirements

Section S5.C.1 of the 2019-2024 Phase II Permit requires the City to:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
 - ✓ By August 1, 2020, provide a written description of internal coordination mechanisms.
- ➤ Report on how stormwater management needs and receiving water protection/improvement inform the long-range planning update process and influence policies and implementation strategies
 - ✓ On or before March 31, 2021, complete report questions to describe how anticipated stormwater impacts on water quality were addressed in the 2013-2019 permit term in updates to the Comprehensive Plan.
 - ✓ On or before <u>January 1, 2023</u> the same questions will be answered for the 2019-2024 permit term.
- Annually, assess and report any newly identified administrative or regulatory barriers to implementation of low impact development (LID) principles or LID BMPs. Report on measures to address barriers since local codes were adopted in 2016, and mechanisms to encourage or require LID implementation.
 - ✓ <u>Annually</u> report on barriers and measures to address them.
- > Implement stormwater management action planning (SMAP):
 - ✓ Review existing information to assess local receiving water bodies and contributing basin conditions. By <u>March</u>, 31, 2022 submit a watershed inventory.
 - ✓ By <u>June 30, 2022</u> develop a prioritization method and process to identify and rank receiving water bodies for stormwater facility retrofits and management actions.
 - ✓ By March 31, 2023 develop a Stormwater Management Action Plan (SMAP) for at least one high priority catchment area.

2.2 2020 Planned Activities

In 2020, the City will take the following steps towards meeting Stormwater Planning requirements:

- ➤ The City will continue to work with our interdisciplinary team to improve processes and implementation of this program. This interdisciplinary team includes the following personnel within City departments:
 - Surface Water Management group
 - Public Works Maintenance

- Planning and Community Development
- Construction Inspection
- Building Official/Code Enforcement
- GIS/IT
- City Manager
- Maple Valley Police Department
- Puget Sound Fire Authority
- ✓ A description of the coordination mechanisms is attached to the 2019 Annual Report.
- ➤ The City will work with the Community Development Department to continue to incorporate stormwater management needs and receiving water protection and improvement in the long-range planning update process and influence policies and implementation strategies.
 - ✓ The City will include a report of how this was addressed in the previous Comprehensive Plan update in the 2021 SWMP.
- The City will continue to work with City Planners and the Development Engineer to identify any existing administrative or regulatory barriers to implementation of LID principles or LID BMPs.
 - ✓ None were identified in 2019. If any are identified in 2020 they will be reported in the 2020 Annual Report and 2021 SWMP.
- ➤ In 2020 the City will work toward future SMAP requirements in the following way:
 - ✓ Work with Our Green Duwamish (OGD) to continue the development of a watershed wide mapping tool to inform regional decision making related to stormwater management. A proof of concept tool is expected to be ready by the end of 2020. This tool will help with the watershed inventory, receiving water assessment, and receiving water prioritization requirements of SMAP.

3. Public Education and Outreach S5.C.2

This section describes Permit requirements related to Public Education and Outreach. The Public Education and Outreach element of the Permit is intended to build general awareness about methods to address and reduce impacts from stormwater runoff, effect behavior change to eliminate practices that contribute to adverse stormwater impacts, and create opportunities for community engagement. This section lists the current and continuing programs and activities that met Permit requirements in 2019, and identifies the planned activities recommended for continued compliance with the current Permit in 2020.

3.1 Permit Requirements

Section S5.C.2 of the 2019-2024 Phase II Permit requires the City to:

- Implement an education and outreach program for the area served by the MS4. The program shall be based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs. Based on the target audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the target audience.
 - ✓ <u>Annually</u> select a minimum of one target audience and one subject area and provide subject area information to the target audience on an ongoing or strategic schedule
 - Target audience 1: General public or businesses
 - Subject areas:
 - o General impacts of stormwater on surface waters, including impacts from impervious surfaces.
 - o LID principles and BMPs
 - Target audience 2: Engineers, contractors, developers, or land use planners
 - Subject areas:
 - Technical standards for stormwater site and erosion control plans.
 - o LID principles and BMPs
 - O Stormwater treatment and flow control BMPs/facilities
 - ✓ To affect behavior change, <u>annually</u> select, at a minimum, one target audience and one BMP.
 - Target audiences: residents, landscapers, property managers/owners, developers, school age children, or businesses.
 - BMPs
 - Use and storage of: pesticides, fertilizers, and/or other household chemicals
 - O Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials
 - o Prevention of illicit discharges
 - o Yard care techniques protective of water quality.
 - o Carpet cleaning

- Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings
- o Pet waste management and disposal
- LID principles and BMPs
- o Stormwater facility maintenance, including LID facilities
- o Dumpster and trash compactor maintenance
- o Litter and debris prevention
- Sediment and erosion control
- o Audience specific source control BMPs
- o Locally-important, municipal stormwater-related subject area
- ✓ By <u>July 1, 2020</u>, conduct a new evaluation of the effectiveness of an ongoing behavior change campaign. Document lessons learned and recommendations for which future option to select. The Permittee may forgo this evaluation if they choose to develop a strategy and schedule for a new target audience and BMP behavior change campaign by February 1, 2021.
- ✓ By <u>February 1, 2021</u>, follow social marketing practices and methods, similar to community-based social marketing, and develop a campaign that is tailored to the community, including development of a program evaluation plan. The Permittee shall:
 - Develop a strategy and schedule to more effectively implement the existing campaign; or
 - Develop a strategy and schedule to expand the existing campaign to a new target audience or BMPs; or
 - Develop a strategy and schedule for a new target audience and BMP behavior change campaign.
- ✓ By April 1, 2021, begin to implement the strategy developed
- ✓ By March 31, 2024, evaluate and report on:
 - The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy; and
 - Any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.
- Provide and advertise stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.

3.2 2019 Activities

The City currently has an active public education and outreach program that uses a variety of approaches to inform the community about stormwater-related pollution prevention activities. The activities continued in 2019 included the following.

➤ General Awareness and Behavior Change

Business Outreach – King County Hazardous Waste Educational Inspections

The City partnered with King County Hazardous Waste to perform non-regulatory business inspections of all businesses with storefronts in Maple Valley that through their daily

business have the potential to impact stormwater. Through their inspections they would provide informational material on hazardous waste disposal, source control BMPs, provided free spill kits, and vouchers for purchase of BMPs. In 2019 24 businesses were visited.

School Aged Children Education – Nature Vision Stormwater Elementary Education Program

The City continued to contract with Nature Vision to teach educational programs at the three elementary schools within the City of Maple Valley. In 2019 Nature Vision focused on three programs, Watershed Dynamics (Enviroscape), Watershed Ecosystems, and Healthy Water Healthy Soil to grades 2-5. During 2019, 39 classes were taught reaching a total of 987 students.

Resident Education - Car Wash Kit Program

The City continued to partner with the Les Schwab in Maple Valley to allow for charity carwashes on their property only with use of a free car wash kit, provided by the City. This program is advertised both through the City of Maple Valley website and by Les Schwab when organizations request to have a charity car wash. With the car wash kit, the City provides information on how washing cars in the street impacts surface waters.

Engineer, Contractor and Developer Education - Providing Technical Standards

During pre-application meetings and during planning and construction phases, the City continued to provide technical standards for stormwater site and erosion control plans, basic LID principle information, and stormwater flow control and water quality requirements to engineers, contractors, and developers.

Business Outreach - Mobile and Home Business BMP Information

City Planners distributed information on car washing and maintaining vehicles to businesses who applied for and received business permits for businesses that are operated out of the home and utilize one or multiple vehicles to provide services.

General Public Education

Additional education programs to reach the general public included:

- Maintaining spill and IDDE reporting contact information on the City website.
- Maintaining IDDE information on the website and information on the type of activities that can result in illicit discharge to surface waters.
- Updated links on the City website for information on:
 - o LID
 - o Puget Sound Rain Gardens
 - o Natural Lawn Care
 - o Scoop the Poop
 - o 2016 King County Stormwater Pollution Prevention Manual
 - o Department of Ecology
 - o Don't Drip and Drive
 - Construction Stormwater General Permits

- Providing information on the website for BMPs including:
 - Carpet cleaning
 - o Residential automobile repair and maintenance
 - o Landscaping activities and vegetation management
 - Vehicle washing
 - o Pet waste
 - o Residential gardening and lawn care
- Providing stormwater education brochures available at the entrance to City Hall.
- Providing natural yard care brochures at the Lake Wilderness Arboretum's annual plant sale.
- Hosting a booth at the Lake Wilderness Boat Launch for Maple Valley Days. At the booth brochures on the Surface Water Management Program and accessories were given to the public for free. Volunteers also accepted public comments for City's SWMP during this event.

Stewardship

Volunteer Water Quality Monitoring Program

Implemented volunteer water quality monitoring under the Lakes Management Program. The City contracted with the King County Department of Natural Resources, Water and Land Resources Division, to monitoring water quality in Lake Lucerne, Pipe Lake, and Lake Wilderness, with the assistance of volunteers. City and King County staff were available to discuss water quality topics with citizens or volunteer groups and to provide information.

Adopt-a-Road

The City provides supplies for our local adopt-a-road roadside trash pickup program for local groups. This program is advertised on the City's website.

SWMP and Annual Report

Posted the City's 2019 Surface Water Management Plan (SWMP) on the front page of the City's website under news and update information with request for public comments for the proposed Plan. Public comments were accepted throughout the implementation of the plan. The most current version of Annual Report and SWMP Plan are also posted on the City's website under Surface Water Management and NPDES Phase II along with previous annual reports and SWMP Plans.

Storm Drain Marking

The City encourages the public to install storm drain markers in their neighborhood. The City has free storm drain markers that can be used by individuals or school/civic groups. In 2019, the City began an inventory of catch basins that were missing or had damaged storm drainage markers to inform this program in 2020.

3.3 2020 Planned Activities

The City's implementation plan for 2020 to achieve the goals and objectives of the Public Education and Outreach Program includes continuing the activities detailed in the previous section, along with the additional activities described below.

General Awareness and Behavior Change

- ✓ The City has decided to select option S5.C.2.a.ii.(c)3 of the Permit to develop a schedule and strategy for a <u>new</u> target audience and BMP behavior change campaign. In 2020, the City will work with a STormwater Outreach for Regional Municipalities (STORM) subgroup on developing a dumpster source control outreach strategy for businesses and multi-family properties, to begin implementing in 2021.
- ✓ The City will work with Nature Vision to reach out to Tahoma High School teachers to begin implementing additional instructional programs on stormwater and the environment within the high school.
- ✓ The City will work with the Garden Hotline of King County to bring courses on natural yard care to Maple Valley. The City plans to conduct a survey advertised on the City website and Facebook to determine resident's current understanding of natural yard care and their interest in certain classes in early spring of 2020. The City hopes to hold at least 2 classes instructed by the Garden Hotline within City limits in 2020.

> Stewardship

✓ Target outreach for the storm drain marking program based on inventory of missing or damaged markers.

4. Public Involvement and Participation S5.C.3

This section describes Permit requirements related to Public Involvement and Participation. This section lists the current and continuing programs and activities that met Permit requirements in 2019, and identifies the planned activities recommended for continued compliance with the current Permit in 2020.

4.1 Permit Requirements

Section S5.C.3 of the 2019-2024 Phase II Permit requires the City to:

- ➤ Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and update of the Permittee's SMAP and SWMP.
- Each Permittee shall post on their website their SWMP Plan and the Annual Report. All other submittals shall be available to the public upon request.
 - ✓ By May 31st each year post SWMP Plan and Annual Report on the City's website.

4.2 2019 Activities

The Public Involvement and Participation activities that took place in 2019 included:

- ➤ Partnering with the Lake Wilderness Citizen Advisory Committee.
- Allowing opportunities for residents to comment on the 2019 Surface Water Management rate study findings and recommended rate adjustments at four Council Meetings.
- ➤ Posting the City's 2019 SWMP on the front page of the City's website under news and update information with request for public comments for the proposed Plan. Public comments were accepted throughout the implementation of the plan.
- ➤ Posting the most current version of Annual Report and SWMP Plan on the City's website under Surface Water Management and NPDES Phase II along with previous Annual Reports and SWMP Plans.

4.3 2020 Planned Activities

The City's implementation plan for 2020 to achieve the goals and objectives of the Public Participation and Involvement Program includes the activities described below.

- Continuing to partner with the Lake Wilderness Citizen Advisory Committee.
- ➤ Posting the City's 2019 SWMP on the front page of the City's website under news and update information with request for public comments for the proposed Plan. Public comments will be accepted throughout the implementation of the plan.

➤ Posting the most current version of Annual Report and SWMP Plan on the City's website under Surface Water Management and NPDES Phase II along with previous annual reports

and SWMP Plans.

5. MS4 Mapping and Documentation S5.C.4

This section describes Permit requirements related to MS4 Mapping and Documentation. This section lists the current and continuing programs and activities that met Permit requirements in 2019, and identifies the planned activities recommended for continued compliance with the current Permit in 2020.

5.1 Permit Requirements

Section S5.C.4 of the 2019-2024 Phase II Permit requires the City to perform:

- Ongoing Mapping map each of the features listed below:
 - Known MS4 outfalls and known MS4 discharge points.
 - Receiving waters, other than groundwater.
 - Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
 - Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters.
 - Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following features or attributes (or both) shall be mapped:
 - Tributary conveyance type, material, and size where known.
 - Associated drainage areas.
 - Land use.
 - Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.
 - All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- ➤ New Mapping
 - ✓ By <u>January 1, 2020</u>, begin to collect size and material for all known MS4 outfalls during normal course of business and update records.
 - ✓ By <u>August 1, 2023</u>, complete mapping of all known connections from the MS4 to a privately owned stormwater system.
 - ✓ By <u>August 1, 2021</u>, the required format for mapping is electronic, with fully described mapping standards.
- To the extent consistent with national security laws and directives, each Permittee shall make available to Ecology, upon request, available maps depicting he information required above.
- ➤ Upon request, and to the extent appropriate, Permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees.

5.2 2019 Activities

The City maintains a map of our stormwater and surface water system within ArcGIS Desktop that is updated as part of normal course of business as errors are identified in the field or new features are added. An online map of stormwater features is located here:

https://maps.maplevalleywa.gov/portal/apps/webappviewer/index.html?id=489ecd6b2ad6405190e46573419c2f37

Digital or printed maps or any portion of our system are available by request from:

Cathy Walker, GIS Manager

425-413-6628

cathy.walker@maplevalleywa.gov

5.3 2020 Planned Activities

In 2020 the City will continue to maintain and update the map of the required MS4 features. The City has begun reviewing our existing outfall inventory, and we currently have the majority of the sizes and materials for these outfalls identified in the attribute table. During our 2020 inspections we will verify that these attributes are correct and make any necessary updates.

6. Illicit Discharge Detection and Elimination S.5.C.5

This section describes Permit requirements related to Illicit Discharge Detection and Elimination (IDDE). The IDDE element of the Permit is designed to develop an ongoing program to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. This section lists the current and continuing programs and activities that met Permit requirements in 2019, and identifies the planned activities recommended for continued compliance with the current Permit in 2020.

6.1 Permit Requirements

Section S5.C.5 of the 2019-2024 Phase II Permit requires the City to:

- ➤ Implement a program with procedures to report and address illicit discharges including spills, and illicit connections, and procedures to address pollutants from an interconnected, adjoining MS4.
- ➤ Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of wastes.
- ➤ Implement an ordinance that effectively prohibit non-stormwater, illicit discharges into the City's MS4 to the maximum. Evaluate and update existing ordinances, as needed.
- Implement and document a field screening method for illicit discharges and connections, complete screening an average of 12 percent of the stormwater system per year.
 - ✓ <u>Annually</u> track total percentage of the MS4 screened beginning <u>August 1, 2019</u>.
- ➤ Publicize a public hotline number for reporting of spills and other illicit discharges and track all calls and follow-up actions taken.
- ➤ Implement an ongoing training program for municipal field staff on identification and reporting procedures.
- Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, which includes procedures for characterizing the nature and potential threats of an illicit discharge, procedures for tracing the source of an illicit discharge, and procedures for eliminating the discharge within specific timeframes.
- ➤ Implement an ongoing training program for staff responsible for identification, investigation, termination, cleanup and reporting.
- > Track and maintain records of IDDE activities following the Permit-specified format.

6.2 2019 Activities

In 2019 the City maintained ongoing IDDE programs and investigated all reports of potential spills or illicit discharges and inspected for illicit connections during normal catch basin and stormwater facility inspections. These programs included:

Maintenance of a 24-hour spill reporting hotline, advertised on the City's website.

- Maintaining information and links on the City's website about the hazards of illicit discharges and how to properly dispose of waste.
- ➤ Adopting King County Title 9 by reference and continuing to enforce Chapter 9.12 titled Water Quality.
- ➤ Holding a training taught by ECOSS for City staff on identifying and reporting illicit connections or discharges.
- ➤ Performing screening of 45% of the City's MS4 system through catch basin and facility inspections.
- ➤ Holding a training taught by ECOSS for SWM Inspection staff and Public Works Maintenance staff on field identification, characterization, response, tracing, and reporting of spills and illicit connections.
- Maintaining records of all spills or illicit discharges regardless of who they were reported by, along with the response and any required reporting. These records were kept in electronic files and tracked in an Excel spreadsheet with all of the Permit-specified information.

6.3 2020 Planned Activities

The City's implementation plan for 2020 to achieve the goals and objectives of the IDDE Program includes continuing the activities in the previous section, along with the additional activities described below.

- ➤ The City will begin tracking and maintaining records of IDDE activities in the Permitspecified format within Cityworks asset management software and use WQWebIDDE reporting.
- The City will implement a new cell phone application called "See Click Fix" for residents to more easily report spills or illicit discharges.
- Additional trainings will be held on an as-needed basis for illicit discharges and illicit connections.

7. Controlling Runoff from New Development, Redevelopment, and Construction Sites S.5.C.6

This section describes Permit requirements related to Controlling Runoff from New Development, Redevelopment, and Construction Sites. This element of the Permit is designed to reduce pollutants in stormwater runoff from construction work, whether it be private or public. This section lists the current and continuing programs and activities that met Permit requirements in 2019, and identifies the planned activities recommended for continued compliance with the current Permit in 2020.

7.1 Permit Requirements

Section S5.C.6 of the 2019-2024 Phase II Permit requires the City to:

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction sites and adopt minimum requirements, thresholds and definitions in Appendix 1 of the Permit or approved program and amendments.
 - ✓ Adopt this ordinance or program by <u>June 30, 2022</u>.
- Review all stormwater site plans for proposed development activities.
- Conduct inspections of construction sites prior to clearing and construction, during construction, and upon completion of construction.
- ➤ Provide a link to state stormwater general permit NOI forms for construction and industrial sites.
- Conduct ongoing training for staff responsible for implementing the Program.

7.2 2019 Activities

The City currently has an active program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The existing program currently applies to both public and private projects, including roads. The current compliance activities associated with this program include:

- Adopting King County Title 9 by reference and continuing to enforce Chapter 9.04 titled Stormwater Runoff and Surface Water and Erosion Control.
- > Reviewing all stormwater plans, including those for public projects and private development.
- > Implemented a new pre-construction inspection form for inspecting sites prior to clearing.
- ➤ Conducting all construction inspections as required by the permit. No enforcement actions were necessary as a result of inspections in 2019.
- ➤ Providing appropriate copies of the "Notice of Intent for Construction Activity" and "Notice of Intent for Industrial Activity" to representatives of proposed new development and redevelopment sites.

➤ Providing opportunities for inspection staff to attend local trainings related to controlling stormwater runoff from new development, redevelopment and construction sites to refresh and update their knowledge.

7.3 2020 Planned Activities

The City's implementation plan for 2020 to achieve the goals and objectives of the Controlling Runoff from New Development, Redevelopment, and Construction Sites Program includes continuing the activities in the previous section, along with evaluating our existing municipal code to determine if future updates are needed to meet all permit requirements by <u>June 30, 2022</u>.

8. Operations and Maintenance S5.C.7

This section describes Permit requirements related to Operations and Maintenance (O&M). This element of the Permit is designed to regulate maintenance activities and to conduct maintenance activities to prevent or reduce stormwater impacts. This section lists the current and continuing programs and activities that met Permit requirements in 2019, and identifies the planned activities recommended for continued compliance with the current Permit in 2020.

8.1 Permit Requirements

Section S5.C.7 of the 2019-2024 Phase II Permit requires the City to:

- > Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the *Stormwater Management Manual for Western Washington* and develop maintenance standards for facilities that do not have them.
 - ✓ Update maintenance standards as necessary to meet this requirement by **June 30**, **2022**.
- ➤ When an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed:
 - Within 1 year for typical maintenance of facilities, except catch basins.
 - Within 6 months for catch basins.
 - Within 2 years for maintenance that requires capital construction of less than \$25,000
- > Implement a program for maintenance of stormwater facilities regulated by the City by implementing an ordinance that identifies who is responsible for long term maintenance, allows for annual inspections, and establishes enforcement procedures.
 - ✓ <u>Annually</u> inspect all stormwater treatment and flow control BMPs/facilities that discharge to the MS4.
 - Maintain records of inspections and enforcement actions.
- ➤ Implement a program for maintenance of stormwater facilities owned or operated by the Permittee.
 - ✓ <u>Annually</u> inspect all stormwater treatment and flow control BMPs/facilities and take appropriate maintenance.
- > Spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events and conduct maintenance and repairs as needed.
- Inspect all catch basins and inlets owned or operated by the Permittee every two years and clean as needed based on maintenance standard.
- > Implement and document practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City and road maintenance activities under the functional control of the City.
- Implement an ongoing training program for employees whose job functions may impact stormwater quality.

- ➤ Implement Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City.
 - ✓ Update SWPPPs no later than <u>December 31, 2022</u> to meet updated requirements.
- Maintain records of inspections, maintenance, repair, and enforcement activities.

8.2 2019 Activities

The City currently has an active O&M program to reduce stormwater impacts. The current compliance activities associated with this program include:

- ➤ Using maintenance standards described in the adopted 2016 King County Surface Water Design Manual.
- Continuing to conduct annual inspections of facilities regulated by the City.
 - ✓ In 2019, all sites that have a stormwater treatment and flow control BMP/facility were inspected, and maintenance was requested and followed up on where necessary. All inspections were documented in the City's Computerized Maintenance Management System (CMMS).
- ➤ Continuing to conduct annual inspections of City owned and operated facilities.
 - ✓ In 2019, all City owned stormwater treatment and flow control BMPs/facilities were inspected and maintenance was performed within required timelines. All inspections and maintenance were documented in the City's CMMS.
- Continuing to conduct inspections of City-owned or operated catch basins within two-years.
 - ✓ The City inspected 2,609 catch basins in 2019. The City was unable to complete inspections of all of our catch basins within the previous 2-year period ending July 31, 2019. A G-20 letter was provided to Ecology due to this violation. The City is on track to inspect all catch basins within the current two-year cycle.
 - \checkmark The City cleaned 2,038 catch basins in 2019 as a response to inspections.
 - ✓ All inspections and maintenance were documented in the City's CMMS.
- > Spot checking potentially impacted stormwater treatment and flow control BMPs/facilities after identified large storm events.
- Continuing practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads, or highways owned or maintained by the City. The following activities are addressed:
 - ✓ Ditch maintenance
 - ✓ Cleaning of culverts that convey stormwater in ditch systems
 - ✓ Pipe cleaning
 - ✓ Road repair and resurfacing, including pavement grinding
 - ✓ Snow and ice control
 - ✓ Utility installation
 - ✓ Pavement striping maintenance
 - ✓ Maintaining roadside areas, including vegetation management
 - ✓ Dust control
 - ✓ Application of fertilizer, pesticides, and herbicides, as well as the development of nutrient management and integrated pest management plans

- ✓ Sediment and erosion control
- ✓ Landscape maintenance and vegetation disposal
- ✓ Trash management
- ✓ Building exterior cleaning and maintenance
- ➤ Hosting a training led by ECOSS on protecting water quality during maintenance activities.
- ➤ Providing training as needed on operation and maintenance standards, inspection procedures, and selecting and installing BMPs.
- ➤ Sending a Maintenance II Worker and our SWM Inspection Technician to CESCL Certification Training.
- Maintaining SWPPPs for existing heavy equipment maintenance or storage yards and material storage facilities owned and operated by the City.
- ➤ Maintaining records of all inspections, cleanings, maintenance, and enforcement within the City's CMMS.

8.3 2020 Planned Activities

The City's implementation plan for 2020 to achieve the goals and objectives of the O&M Program includes continuing the activities in the previous section, along with the additional activities described below.

- ➤ Begin evaluating our existing maintenance standards to determine what updates may be necessary by **Iune 30, 2022**.
- Begin reviewing existing SWPPPs to determine if updates are needed by <u>December 31</u>, 2022.
- ➤ Implement Cityworks as the new CMMS system to better document inspection, cleaning, maintenance and enforcement for both facilities owned and operated by the City and those regulated by the City.
- Complete inspection of 50% of all City-owned catch basins by **August 1, 2020**.
- ➤ Complete all cleaning and maintenance within compliance schedule.

This section describes Permit requirements related to the Source Control Program for Existing Development. This element of the Permit is designed to prevent and reduce pollutants in runoff from areas that discharge to the MS4. This is a new element added to the 2019-2024 Permit, therefore this section will address only the Permit requirements and the planned activities in 2020 related to the Source Control Program for Existing Development.

9.1 Permit Requirements

Section S5.C.8 of the 2019-2024 Phase II Permit requires the City to:

- Apply operational source control BMPs and structural source control BMPs or treatment BMPs/facilities, if needed to existing sources, inspect and enforce BMP implementation at commercial, industrial, and institutional properties, apply and enforce local ordinances at sites, and implement practices to reduce polluted runoff from pesticide, herbicide, and fertilizer applications.
 - ✓ By <u>August 1, 2022</u>, adopt an ordinance requiring the application of source control BMPs for pollutant generating sources.
 - ✓ By <u>August 1, 2022</u>, establish an inventory of commercial and industrial properties with pollutant generating potential.
 - ✓ By <u>January 1, 2023</u>, implement an inspection program for sites identified in the inventory.
 - Provide sites with information about pollutant generating activities.
 - Annually complete the number of inspections equal to 20% of the businesses and/or properties listed in the inventory and inspect all sites identified through complaints.
 - ✓ By <u>January 1, 2023</u>, implement a progressive enforcement policy that includes documented follow-up actions and follow-up inspections.
- ➤ Conduct training for staff responsible for implementing the source control program.

9.2 2020 Planned Activities

In 2020, the City will take the following steps towards meeting Source Control Program for Existing Development requirements:

- ➤ Begin working with other local municipalities who have implemented or are working to implement a source control or business inspection ordinance to determine best practices and lessons learned to factor into the development of the ordinance.
- ➤ Begin gathering an inventory of commercial and industrial properties with pollutant generating potential.
- ➤ When setting up Cityworks CMMS system, consider procedure for source control inspections and enforcement.

10. Total Maximum Daily Load Requirements S7

This section provides a brief discussion of the Phase II Permit requirements for total maximum daily load (TMDL).

10.1 Permit Requirements

Section S7 of the 2019-2024 Phase II Permit requires the City to:

- ➤ Implement the specific requirements identified in Appendix 2 of the Phase II Permit for applicable TMDLs.
- For applicable TMDLs not in Appendix 2, compliance with the remainder of the Permit shall constitute compliance with those TMDLs.
- For TMDLs that are approved by EPA after this Permit is issue, Ecology may establish TMDL related permit requirements through future permit modification.

10.2 2020 Planned Activities

The City is not currently affected by any TMDLs listed in Appendix 2 of the NPDES Phase II Permit and therefore does not have any planned activities in 2020.

11. Monitoring and Assessment S8

This section provides a brief discussion of the Phase II Permit requirements for Monitoring and Assessment.

11.1 Permit Requirements

Section S8 of the 2019-2024 Phase II Permit requires the City to:

- Notify Ecology in writing which option is selected by the City for regional status and trends monitoring.
 - ✓ Notify Ecology by <u>December 1, 2019</u>.
- Notify Ecology in writing which option is selected by the City for effectiveness and source identification studies.
 - ✓ Notify Ecology by **December 1, 2019**.
- > Submit records of SWMP activities tracked and/or maintained in response to requests by the Stormwater Action Monitoring Coordinator.

11.2 2019 Activities

In 2019 the City notified Ecology in writing of our decision to continue to pay into the collective funds for both regional status and trends monitoring and effectiveness studies for the Permit term.

11.3 2020 Planned Activities

In 2020 the City will continue to pay into the collective funds and will provide any necessary data as requested by the Stormwater Action Monitoring Coordinator.

12. Reporting S9

This section provides a brief discussion of the Phase II Permit requirements for Reporting.

12.1 Permit Requirements

Section S9 of the 2019-2024 Phase II Permit requires the City to:

- Submit an annual report to Ecology
 - ✓ Due March 31st of each year.
- ➤ Keep all records related to the NPDES Phase II Permit and the SWMP for at least 5 years
- Make records related to the NPDES Phase II Permit and the SWMP available to the public at reasonable times during business hours.

12.2 2019 Activities

The City submitted our 2018 annual report prior to March 31, 2019 and continued to keep thorough records of all NPDES Phase II Permit and SWMP activities.

12.3 2020 Planned Activities

The City will submit our 2019 annual report prior to March 31, 2020 and continue to keep thorough records of all NPDES Phase II Permit and SWMP activities.